STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
P.O. Box 47600 • Olympia, Washington 98504-7600
(360) 407-6000 • TDD Only (Hearing Impaired) (360) 407-6006

October 23, 2003

Brian Wood
Weyerhaeuser
3401 Industrial Way
P.O. Box 188
Longview, WA 98632-7117

Dear Mr. Wood:

Review of Prevention of Significant Deterioration Application
PSD-97-01 NORPAC High Bright Paper

The Washington State Department of Ecology's (Ecology) Air Quality Program has reviewed the September 2003 Prevention of Significant Deterioration (PSD) application for the High Bright Paper project. Several issues need to be resolved before the permit can be prepared. Therefore, the application has been determined to be "INCOMPLETE".

Please respond in writing to the enclosed comments. We do not anticipate taking the full 30 days to review your responses. Once the application is deemed complete, we should be able to present you with a draft permit within two weeks.

If you have any questions, please call me at (360) 407-6896.

Sincerely,

Richard B. Hibbard, P.E.
Project Engineer

RBH:te

Enclosure

cc: Doug Hardesty, EPA
Dan Meyer, EPA
Bob Bachman, USFS
Elizabeth Waddell, NPS
Marc Crooks, Industrial Section
Greg Bean, Weyerhaeuser

Comments on the
Weyerhaeuser Company NORPAC
Request for Change in Conditions
September 2003 PSD-97-01 Amendment 1

1. Appendix E, Table E-2 and E-3

This table uses the years 2000 and 2002 for calculating the facilities "Past Actual" emissions. The Prevention of Significant Deterioration (PSD) rules require that a previous consecutive 2-year (24 months) period be used unless it is determined that those two years is not representative of normal operation. In an e-mail received from Mr. Greg Bean on October 20, 2003, a statement was made that due to "high energy costs", emissions from 2001 were not representative of normal operation. Ecology agrees with this argument.

Please revise Tables E-2 and E-3 to incorporate the next more representative 2-year (24-month) period for the purpose of calculating past actual emissions. Please note that Ecology recognizes that this change will effect calculations in other parts of the Request for Change in Conditions report including the netting analysis. Please revise the appropriate sections.

2. Comments Submitted by EPA Region X

NORPAC's submittal assumes that the TMP mill has been modified between 1994 and 2002. Such that the VOC emission factors for each emission unit within the mill should be different for those two time periods. In reviewing the changes to the mill between 1994 and 2002, it is not clear for all emission units that the emissions and therefore the emission factors should have changed, even though the emission tests reflect different emission levels. The variability of operation and the emissions for a given process can sometimes result in significant swings in the emission levels, even where there have been no process modifications. It would be helpful to have a better understanding of the affect on emissions that certain changes may have had.

In the case where emission vary through normal operation, and there hasn't been an operational change which would explain the change, multiple emission measurements should be considered to determine how to represent the emissions from the source on average. This is particularly true when trying to make comparisons for applicability purposes.

NORPAC should explain their assumptions (regarding the affect on emissions) for the following changes and sources:

2-1. Elimination of the atmospheric steam bypass. The document doesn't explain where this was and therefore where the organics might still be in the system. Obviously, organics previously removed, but now left in the system can become emissions downstream.

2-2. Rotary valves 2, 3, 4, 5, 6, 7, 8 and 9. Similar to the atmospheric steam bypass, a significant contribution of organics appear to be returned to the "system." Can we expect to see this emission show up downstream in the process? Also, explain how there can be 100%

fugitives from one surge tank, but none from the other eight, understanding that the 100% assumption is conservative based on observations, but also understanding the nature of fugitives. Are the surge tanks pressurized systems that can handle the addition of the previously exhausted gases or is there another route the gases can take through the system?

2-3. Non-condensable gases routed to falling film condenser. The document is not clear as to where these gases went prior to the change. The fact that they are now vented to the system which exhausts through the #2 spray condenser would lead to the expectation of an increase in emissions.

2-4. Bleach towers. These sources experienced a significant emission reduction between 1994 and 2002. The document does qualify CO emission changes as depending on the inherent variability of the process. It is not clear which changes, if any, would explain the lower measured emission rates.

2-5. Decker. This source experienced a significant emission reduction between 1994 and 2002, but it is not clear which operational change may have caused this reduction.

3. Comments Submitted by Ecology's Industrial Section

After our conference call last Monday, October 20th, with Doug Hardesty concerning the NORPAC request for change in conditions of their PSD Permit 97-01, I believe all my comments were discussed in some detail, and Doug's list of questions was very comprehensive. As I promised you, here are my comments in writing to assist in the final compilation of comments you are putting together for our agency.

- As noted on Page 1-1, this is a good opportunity to clarify the incremental emissions increases allowed in approval orders 95AQ-I076 and 96AQ-I093. This will consolidate and improve the Air Operating Permit.

- We are all in full agreement that the emission data needs to be two (2) consecutive years. It is my understanding from Weyerhaeuser's response to your e-mail message that Weyerhaeuser will submit the appropriate consecutive two years of data.

- If the data demonstrates that the emission factors require revision, then Ecology should use the revised emission factors as discussed on Page 3-1.

- The proposed change does net out. From our discussions with Doug Hardesty, the PSD program does allow for this requested change in conditions. The new limits due to the change in operation would have to be addressed in a federally enforceable limit in a regulatory order.

- As Doug Hardesty asked me last Monday, the Facility Changes discussed on Page 2 of 16 in Appendix C are permanent changes and improvements to the facility.

- The submittal appears to be complete except for the two years of consecutive emission data that originally was submitted with a break in one year of the data.

- Order No. DE96AQ-I093 was listed in the application. This order approved the improvement to the thermomechanical pulping (TMP) screening units at the NORPAC newsprint recycling and production facility that is part of the Weyerhaeuser Longview pulp mill. The modifications were permanent and reduced the amount of pulp reprocessed through the secondary refining process, and thus, increased the TMP production capacity. The project was approved by the Industrial Section on December 23, 1996.